

## **Exhibit 4**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, <i>et al</i> ,	§	
	§	
Plaintiffs,	§	
VS.	§	CIVIL ACTION NO. 2:13-CV-00193
	§	
RICK PERRY, <i>et al</i> ,	§	
	§	
Defendants.	§	

**FIRST AMENDED DPS RESPONSES TO**  
**WRITTEN DEPOSITION QUESTIONS PURSUANT TO RULE 31**  
**REGARDING SPECIFIED TOPICS FROM THE UNITED STATES' NOTICE**  
**OF RULE 30(b)(6) DEPOSITION OF THE TEXAS DEPARTMENT OF**  
**PUBLIC SAFETY**

The responses to questions 1-277 and 284-303 were prepared by Sheri Gipson, Senior Manager, Records and Enforcement, Customer Support, Driver License Division. The background information requested regarding Ms. Gipson was provided during her deposition taken by the Plaintiffs on June 9, 2014.

The responses to questions 278-273 were prepared by John Crawford, Applications Manager, Licensing Services, Information Technology Division. The background information requested regarding Mr. Crawford was provided during his deposition taken by the Plaintiffs on July 30, 2014.

**Questions**

**Topics 8-11**

1. Describe the purpose of the card status field with respect to the DPS database of Texas driver license records.

RESPONSE: The Driver License System (DLS) is built based on person records. Within this record, the person could hold both a Texas driver license and a Texas Identification Card. While there are common data fields that apply to the person and both cards (name and address for example), card status is designed to identify administrative actions that only apply to one card, not the entire person record.

2. Yes or no, does the single fact of having any one of the following card statuses with respect to a Texas driver license record require the license holder to physically give up possession his or her Texas driver license card to DPS:

- Purged
- Revoked Sex Offender
- Voluntary Surrender
- Voluntary Surrender CSO
- Denied Texas Limb Waiver
- Denied Texas Vision Waiver
- Expired Limb Waiver
- Expired Vision Waiver
- Ignition Interlock Required
- Limb Waiver Needed
- Required Downgrade
- Restriction Requires Review
- Verify Issue Former State
- Vision Waiver Needed
- Voluntary Surrender Insurance
- Voluntary Surrender Medical
- Returned By Post Office
- Items Surrendered
- Documents Needed

RESPONSE: No, there is no requirement that a license holder physically give up possession of a Texas driver license if one of these statuses is listed in the Card Status field. However, a card status of Voluntary Surrender, Voluntary Surrender CSO, Voluntary Surrender Insurance and Voluntary Surrender Medical means the customer has voluntarily surrendered their card.

3. If the answer to question 2 above is yes, please identify which, if any, of the above-listed driver license card statuses require the license holder to physically give up possession his or her Texas driver license card to DPS.

RESPONSE: There is no requirement that a license holder physically give up possession of a Texas driver license if one of these statuses is listed in the Card Status field. However, a card status of Voluntary Surrender, Voluntary Surrender CSO, Voluntary Surrender Insurance and Voluntary Surrender Medical means the customer has voluntarily chosen to surrender their card

4. Please identify which, if any, of the above-listed driver license card statuses indicate that the license holder does not have actual possession his or her Texas driver license card.

RESPONSE: The Department cannot state whether or not a person has actual possession of his or her Texas driver license.